

**REVISED**

ADMINISTRATIVE - 8

Authorization to Advertise a Public Hearing to Approve a Real Estate Exchange Agreement Between the Board of Supervisors and AvalonBay Communities, Inc. ("AvalonBay") and to Approve the Purchase of Property from 5827 Columbia Pike Associates, LLC, an Affiliate of Landmark Atlantic, Inc. ("Landmark") (Mason District)

ISSUE:

Authorization to advertise a public hearing to consider the disposition of County-owned property totaling approximately 1.49 acres identified as Tax Maps 61-2 ((19)) parcels 5A and 11A ("County Land") as required by Va. Code Ann. § 15.2-1800 (2012). The disposition of the County Land will be considered in connection with a Real Estate Exchange Agreement ("REEA") between the Board of Supervisors and AvalonBay concerning a portion of the property identified as Tax Maps 61-2 ((1)) parcels 113, 113A, 113C and 114 and 61-4 ((30)) parcels 15 and 17, totaling approximately 4.47 acres ("Avalon Land"). The public hearing will also consider the purchase by the Board of adjoining land identified as Tax Map 61-2 ((1)) parcel 12A and totaling approximately 1.44 acres, from Landmark ("Landmark Land") for the primary purpose of a road connection to Seminary Road and new open space. The County Land, Avalon Land and Landmark Land shall hereafter be collectively known as the "Subject Property." It is intended that a rezoning action will be considered on the Subject Property to permit residential development by AvalonBay and a future County office site, as well as the connection to Seminary Road.

RECOMMENDATION:

The County Executive recommends the Board authorize advertisement of a public hearing on January 12, 2016, at 3:00 p.m., to consider disposition of the County Land in connection with an REEA with AvalonBay providing for an exchange of real property and joint infrastructure development in conjunction with the development of the Subject Property, and to consider the purchase of the Landmark Land primarily for public roads and open space.

TIMING:

Board Action is requested on December 8, 2015, to provide sufficient time to advertise the proposed public hearing on January 12, 2016, in accordance with Va. Code Ann. §15.2-1800 (2012).

BACKGROUND:

The County is the owner of the County Land (approximately 1.49 acres), AvalonBay is the contract purchaser of the Avalon Land (approximately 4.47 acres), and Landmark is

the owner of the Landmark Land (approximately 1.44 acres). These land areas are shown, approximately, on Attachment 1, with the County Land shown as Area A, the Avalon Land shown as Areas B1 and B2, and the Landmark Land shown as Area C.

The Comprehensive Plan recommends that, with consolidation of at least five acres, the Subject Property may be appropriate for retail/office/residential mixed-use development at an intensity of up to 2.25 FAR. In addition, the Comprehensive Plan calls for a road realignment to connect Seminary Road with Columbia Pike and Moncure Avenue through the eastern portion of the Subject Property. The road realignment through the Subject Property will necessitate the removal of the office building on the Landmark Land.

The County Land is the site of the Baileys Crossroads Community Shelter ("Shelter"), identified in the adopted Capital Improvements Plan ("CIP") for reconstruction. In addition, the CIP identifies a need for a number of community services, currently housed in leased space in the area, to be consolidated into County-owned space in an East County Human Services Center ("ECHSC"), which could be constructed on the future County office site.

AvalonBay will seek rezoning of the Subject Property to permit the construction of a residential mid-rise apartment development of approximately 375 dwelling units, a future County office building, which may house the ECHSC, and the connection to Seminary Road. As proposed, the residential development would be located on the western portion of the site, fronting Moncure Avenue. The County office building would be located on the eastern portion of the site, fronting on the new road (the first phase of the connection to Seminary Road envisioned by the Comprehensive Plan).

The initial step in this process is for the County to purchase the Landmark Land (Area C shown on Attachment 1) to effectuate the first phase of the road network envisioned by the Comprehensive Plan and to allow for development of the entire site in a more comprehensive, cost effective manner. After purchase of the Landmark Land, the County's holdings will total approximately 2.93 acres (Areas A and C). The second step is for the County and AvalonBay, through the REEA, to exchange an equal amount of real estate such that AvalonBay's property is located on the western side of the site (Areas A and B1) and the County's property is consolidated on the eastern side of the site (Areas B2 and C). The REEA will provide for common infrastructure and rezoning costs to be shared between the County and AvalonBay.

The REEA will not require the County to move forward with any specific development of the future County office site, such as, for example, the ECHSC; any such design and construction will be subject to future Board approval. The Shelter on the County Land will be relocated to another site in the area prior to the AvalonBay residential development. The design and construction of both the temporary and permanent locations of the Shelter will also be subject to future Board approval.

Major terms of the Purchase Agreement with Landmark are as follows (the final text of the Purchase Agreement will be available at the time of advertisement of the public hearing):

1. Purchase of the Landmark Land (Area C shown on Attachment 1) for a total of \$6,600,000; \$ 6,350,000 of which will be paid by the County and \$250,000 of which will be paid by AvalonBay pursuant to the REEA.
2. The purchase is contingent upon approval of the joint rezoning application to be pursued by AvalonBay.
3. Provided that the building on the Landmark Land is vacant, the County is prepared to close on this transaction within 30 days after approval. At closing, the existing lease of a County-sponsored dental clinic located within the existing Landmark building will terminate, and all rent will abate (which would otherwise be the County's responsibility through June 30, 2018).

Major terms of the REEA with AvalonBay are as follows (the final text of the REEA will be available at the time of advertisement of the public hearing):

1. Exchange of the County Land (Area A shown on Attachment 1) for approximately 1.49 acres of the Avalon Land (Area B2 shown on Attachment 1).
2. Closing on this exchange is contingent upon approval of the joint rezoning application to be pursued by AvalonBay, which shall not be later than July 1, 2017.
3. AvalonBay will place an \$800,000 deposit in escrow which will be forfeited in the event of a default on the REEA by AvalonBay.

FISCAL IMPACT:

The County will pay \$6,350,000 to purchase the Landmark Land with an estimated \$880,000 in additional funds required for the demolition of the office building currently on the Landmark Land. Total funding is available in Fund 40010, County and Regional Transportation Projects, in the amount of \$7,230,000 for the property as Right of Way (ROW) acquisition for a future street connection between Columbia Pike and Seminary Road. Transportation staff will return to the Board in February 2016 to request this authorization, and the funding will formally be moved as part of the FY 2016 Carryover Review.

The County's share of the rezoning and common infrastructure costs to support the Development Agreement with AvalonBay will be approximately \$147,000. Funding is available to authorize the Development Agreement in Fund 30010, General Construction and Contributions, Project 2G25-085-000, Public Private Partnership Development.

The cost for the relocation of the Shelter to a temporary location will be \$2,100,000. Funds are available in the amount of \$1,100,000 in Fund 30010, General Construction and Contributions, Project HS-000013, Bailey's Homeless Shelter. The additional

Board Agenda Item  
December 8, 2015

\$1,000,000 will be reallocated from balances available in Project HS-000005, Merrifield Center, as part of the FY 2016 Third Quarter Review.

ENCLOSED DOCUMENTS:

Attachment 1: Approximate land areas of ownership on the Subject Property

STAFF:

Robert A. Stalzer, Deputy County Executive

Alan Weiss, Office of the County Attorney

Katayoon Shaya, Department of Public Works and Environmental Services

Tracy Strunk, Office of Community Revitalization



Board Agenda Item  
December 8, 2015

ACTION - 8

Endorsement of Comments on the Draft Environmental Impact Statement for the  
Federal Bureau of Investigation Headquarters Consolidation

ISSUE:

The General Services Administration (GSA) and Federal Bureau of Investigation (FBI) have issued a Draft Environmental Impact Statement (DEIS) for the proposed consolidation of the FBI Headquarters. A 45-day comment period for the DEIS ends on January 6, 2016.

RECOMMENDATION:

The County Executive recommends that: (1) the Board of Supervisors endorse the cover letter (for signature by the Chairman) and comments prepared by staff (see Attachment 1) and authorize the transmittal of these materials to GSA; and (2) the Board of Supervisors authorize staff to furnish additional technical comments before the January 6, 2016 deadline.

TIMING:

Board action is requested on December 8, 2015, in order to meet the January 6, 2016 deadline for comments and to meet the Virginia Department of Environmental Quality's request for comments by December 11, 2015.

BACKGROUND:

The FBI is proposing a new complex that can accommodate the agency's entire Headquarters operations in one location and is seeking a private sector exchange partner that can build this new complex in exchange for the ability to redevelop the existing FBI Headquarters at the J. Edgar Hoover building on Pennsylvania Avenue in the District of Columbia. Three sites are being considered for the Headquarters consolidation:

- The GSA-Parr Warehouse site near the Joe Alexander Transportation Center in Springfield;
- An existing parking lot adjacent to the Greenbelt Metrorail Station, in Prince George's County, Maryland; and
- The former site of the Landover Mall, in Prince George's County.

The project would include the following:

Board Agenda Item  
December 8, 2015

- A secure 2.4 million square foot office building (up to 12 stories [180 feet in height] for the Springfield Alternative);
- A 60,000 square foot visitor center (two stories maximum);
- A truck inspection/remote delivery facility, with a 9,000 square foot structure (two stories maximum);
- A Central Utility Plant between 124,000 and 128,000 square feet, including stand-by electrical generators (two stories maximum); and
- Parking structures to accommodate employees and visitors. For the Springfield Alternative, two employee parking garages with a total of 3,600 employee parking spaces would be provided. An additional 145 visitor parking spaces would be provided. The parking structures would be no more than seven stories in height.

On October 30, 2015, GSA issued a Notice of Availability for, and Notice of Public Hearings on, a DEIS for the proposed FBI Headquarters consolidation. The DEIS addresses environmental impacts that would be associated with the consolidation at each of the three aforementioned sites, along with a No-action Alternative that would retain the current FBI Headquarters at the J. Edgar Hoover building. In addition, the DEIS addresses environmental impacts that may be anticipated by the redevelopment of the J. Edgar Hoover building site. Mitigation measures are identified where applicable to address potential adverse environmental impacts. GSA is accepting comments on the DEIS through January 6, 2016.

On October 23, 2014, the County Executive transmitted a letter to GSA in response to an invitation to provide comments regarding the scope of the DEIS. The County Executive's letter expressed strong support for the FBI Headquarters consolidation at the Springfield site and offered the county staff's assistance in facilitating development at the site.

Staff has reviewed the DEIS and has prepared a letter for the Chairman's signature and comments for transmittal to GSA. The proposed letter and comments are enclosed as Attachment 1. The Department of Planning and Zoning (DPZ) coordinated the preparation of these materials, but the cover letter and comments reflect the collective efforts of the following agencies:

- Department of Planning and Zoning
- Department of Transportation
- Office of Community Revitalization
- Department of Public Works and Environmental Services



Board Agenda Item  
December 8, 2015

The proposed correspondence confirms the county's support for the Springfield Alternative. The attachment to the Chairman's letter identifies a number of issues and concerns with the DEIS within the supportive context of the letter. Many of the comments identify inconsistencies within the DEIS and/or differing views relating to conclusions about environmental impacts of the Springfield Alternative, while other comments offer county staff's assistance in addressing specific design-related considerations. Other comments provide factual corrections or clarifications. Additional technical comments on the information presented in the Draft Environmental Impact Statement and its supporting documents will also be sent to GSA by Fairfax County staff before the end of the comment period.

FISCAL IMPACT:  
None.

ENCLOSED DOCUMENTS:  
Attachment 1: Draft letter from Chairman Bulova to Ms. Denise Decker, General Services Administration, transmitting the staff comments on the Draft Environmental Impact Statement.

STAFF:  
Robert A. Stalzer, Deputy County Executive  
Fred R. Selden, Director, Department of Planning and Zoning (DPZ)  
Tom Biesiadny, Director, Department of Transportation (DOT)  
Marianne R. Gardner, Director, Planning Division (PD), DPZ  
Noel H. Kaplan, Planner IV, Environment and Development Review Branch (PD), DPZ



**SHARON BULOVA**  
CHAIRMAN

COMMONWEALTH OF VIRGINIA  
**County of Fairfax**  
BOARD OF SUPERVISORS

12000 GOVERNMENT CENTER PKWY  
SUITE 530  
FAIRFAX, VIRGINIA 22035-0071  
  
TELEPHONE: 703/324-2321  
FAX: 703/324-3955  
TTY: 711

chairman@fairfaxcounty.gov

December 8, 2015

U.S. General Services Administration  
Public Building Service  
National Capital Region  
Office of Planning and Design Quality  
Attention: Ms. Denise Decker  
301 7th Street, SW, Room 4004  
Washington, D.C. 20407

Reference: Draft Environmental Impact Statement for the Federal Bureau of Investigation Headquarters Consolidation

Dear Ms. Decker:

On behalf of the Fairfax County Board of Supervisors, I am pleased to provide to you Fairfax County's comments on the Draft Environmental Impact Statement (DEIS) for the Federal Bureau of Investigation (FBI) Headquarters Consolidation. It is also my pleasure to confirm the support of the Fairfax County Board of Supervisors for the selection of the Springfield Alternative for the proposed action. The Board voted unanimously on January 10, 2012, to support the Springfield site. This site is also actively supported by the Commonwealth of Virginia. At our December 8, 2015, meeting, the Board endorsed this letter and the attached comments prepared by county staff. We would welcome this exciting opportunity for both Fairfax County and the FBI and feel that the General Services Administration (GSA)-Parr Warehouse property in Springfield, Virginia would provide an ideal new home for the FBI.

The October 23, 2014, scoping letter from the Fairfax County Executive highlighted the numerous benefits that the Springfield site offers to the FBI, and I will not repeat those details. I will, though, stress that the FBI's and GSA's selection of the Springfield site would build strongly on the transformative changes to the Franconia-Springfield area that are already underway and that FBI staff would benefit from the continuing growth of this area as a vibrant, mixed-use, multimodal destination. From a physical standpoint, the Springfield site offers the FBI an opportunity to develop its new consolidated headquarters complex on a site that has been almost entirely cleared of vegetation and covered with impervious surfaces. There are no floodplains, wetlands or other areas of environmental sensitivity on or immediately adjacent to the site, and redevelopment of the site would provide for substantial improvements of stormwater runoff conditions, thereby improving water resource conditions in downstream areas. Further, the site is already under federal ownership, is well served by infrastructure that would be needed to support the consolidation, and is advantageous in regard to automobile and mass transit travel times from many locations in the Washington, D.C. metropolitan area.

U.S. General Services Administration  
Public Building Service  
Office of Planning and Design Quality  
Attention: Ms. Denise Decker  
Page 2 of 2

We view coordination between the federal government and host communities as being vital during any potential relocation or development of this sort and we stand ready and willing to continue working with you as this process continues. In addition, technical comments on various aspects of the DEIS may be provided by the Fairfax County Department of Transportation, as appropriate, prior to the end of the comment period. Further, as noted in our scoping letter, county staff is available to address any issues it can to facilitate a successful consolidation at the Springfield site, and we encourage the FBI and the GSA to contact Fred R. Selden, Director of the Department of Planning and Zoning, at (703) 324-1262 to identify any such issues.

We are excited by the opportunity to host the FBI's Headquarters and feel that both Springfield and the broader Fairfax County community have many benefits to offer the FBI and its staff. Thank you for providing us with the opportunity to comment on the DEIS for the FBI Headquarters Consolidation.

Sincerely,

Sharon Bulova.  
Chairman, Fairfax County Board of Supervisors

Attachment: As Stated

cc: Fairfax County Board of Supervisors  
Edward L. Long, Jr., County Executive  
Robert A. Stalzer, Deputy County Executive  
Catherine A. Chianese, Assistant County Executive  
Fred R. Selden, Director, Department of Planning and Zoning  
Tom Biesiadny, Director, Department of Transportation  
Barbara Byron, Director, Office of Community Revitalization  
James W. Patteson, Director, Department of Public Works and Environmental Services  
Claudia Arko, Legislative Director  
Janine L. Howard, Environmental Impact Review Coordinator, Virginia Department of  
Environmental Quality

**FBI Headquarters Consolidation  
Draft Environmental Impact Statement (DEIS)  
Fairfax County Staff Comments, December 8, 2015**

These comments have been prepared by staff from the Fairfax County Department of Planning and Zoning, the Department of Public Works and Environmental Services, the Department of Transportation, and the Office of Community Revitalization. Per the cover letter from the Chairman of the Board of Supervisors, the county is strongly supportive of an FBI headquarters consolidation at the Springfield site. These comments are offered within that supportive context.

**Transportation**

- From an accessibility perspective, the Springfield site has major advantages. Although the DEIS does not address differences among the three build alternative sites in regard to travel times from various points of origin in the Washington, D.C. metropolitan area, the county conducted such an analysis, considering automobile and mass transit travel times from 20 locations dispersed throughout the metropolitan area in Virginia, Maryland, and the District of Columbia. This analysis demonstrates that the average travel time for drivers to Springfield from these 20 locations would be eight minutes less than the average time to Landover and nine minutes less than the average time to Greenbelt. For mass transit, the Springfield site would average two minutes better than the Greenbelt site and 23 minutes better than the Landover site. The travel time benefits of the Springfield site would even extend to some points of origin within the state of Maryland. More information about this study is available at <http://www.fairfaxcounty.gov/chairman/news/all-roads-lead-to-springfield.htm>.
- We also note that the Springfield site is considerably closer to the FBI's training facility in Quantico than the current FBI Headquarters at the J. Edgar Hoover building and substantially closer than the Landover and Greenbelt sites, and there is a direct rail connection between Quantico and Springfield via the Virginia Railway Express.
- In the "Public Transit" category, the DEIS concludes that there would be long-term beneficial impacts for FBI employees for the Landover Alternative because these employees would have access to a shuttle (albeit not necessarily "public transit") that would take them to the Largo Town Center Metrorail Station, which is two miles from the Landover site. Yet, no long-term public transit benefits to FBI employees are identified for the Springfield Alternative, even though shuttle service is anticipated and the employees at this site would be able to walk to and from the Franconia-Springfield Metro Station and the Virginia Railway Express station. This conclusion is counterintuitive.
- The county and the Virginia Department of Transportation (VDOT) continue to move forward with the Frontier Drive Extension, which will substantially improve access to the facility. The project will extend Frontier Drive from Franconia-Springfield Parkway to Loisdale Road, including access to Franconia-Springfield Metrorail Station and braided ramps to and from the Parkway. It will also provide on-street parking along Frontier Drive

as well as pedestrian and bicycle facilities. Seventy-five percent of the project's funding has already been programmed in the county's Transportation Priority Plan for FY 2015 to FY 2020, and full funding for this project is anticipated following FY 2020. There has also been a project agreement executed between Fairfax County and VDOT establishing that VDOT will be administering this project. VDOT has selected a consultant for design, which is expected to start in January, 2016.

- The alignment of the Frontier Drive Extension project depicted in the DEIS differs slightly from the 10 percent design level plan alignment that had been initially provided to the GSA/FBI project team. The exact alignment of this extension will be further refined as the Frontier Drive Extension Project progresses; the proposed FBI site layout will be a consideration in this refinement.
- In the section of the DEIS addressing planned roadway improvements, there are no descriptions specific to the proposed braided ramps being considered as part of the Frontier Drive Extension project, which is anticipated to improve operations at the key study intersections and also segments along the Franconia-Springfield Parkway's westbound approach.
- The overview of the mitigation measures presented on page ES-34 identifies the development of a direct pedestrian connection between the east access for the Springfield Alternative site and the Joe Alexander Transportation Center. The FBI and GSA should be aware that, while a six-foot wide pedestrian path was recently completed with the construction of Joe Alexander Road, a new complete street cross-section is also planned between the Metro station and the Springfield Alternative site. The extension of Springfield Center Drive is planned as part of the development of the Springfield Metro Center II, LLC property (to the immediate southeast of the site) and the Frontier Drive extension is a county-led improvement project. Both new streets will be constructed in accordance with the Springfield Connectivity Study's recommendations for Complete Streets, which will include 6-8 foot wide sidewalks and wide landscape panels to accommodate street trees, along with street lights and other amenities. These improvements will provide two safe pedestrian connections between the site and Metro, with less than a ½ mile distance (a 7-10 minute walk) between the station entrance and the site's entrance.
- On pages 540 and 541, the DEIS includes a list of planned roadway improvements for the future no-build condition. Please note that the following improvements have already been made:
  - Study Intersection #16 (item I on page 541): The Frontier Drive northbound left turn onto Spring Mall Drive westbound is currently a dual left turn.
  - Study Intersection #17 (item J on page 541): The Frontier Drive southbound right turn onto the Franconia-Springfield Parkway westbound on-ramp is currently a dual right turn.

- Study Intersection #20 (item M on page 541): The Franconia-Springfield Parkway left turn onto the northbound I-95 HOT Lanes is currently a dual left turn.
- On page 530, the DEIS indicates that the transportation mitigation measures that would be pursued in conjunction with the Springfield Alternative may require property strip takings at two intersections (Loisdale Road at the Fairfax County Parkway, and Loisdale Road at the Frontier Drive extension). Specifically, there would be one commercial property that would be affected by a 60-foot extension of a turn lane (beyond what is currently planned) at the Loisdale Road/Fairfax County Parkway intersection. For the Loisdale Road/Frontier Drive extension intersection, 400-foot strip takings along Loisdale Road are anticipated (conservatively) both north and south of the intersection to support additional turn lanes. Four parcels (three residential and one commercial) would be impacted. It is not clear from the DEIS if structures would need to be removed or if the impacts would be limited to reductions in parcel sizes. The DEIS states that, during the design phase, efforts would be pursued to minimize property takings through design measures (e.g., narrowing travel lanes; shifting the roadway alignment). The Board supports these efforts. County staff is available to assist the FBI in identifying design options that could reduce takings impacts.
- We understand the importance of analyzing any impacts that may occur to mitigate those impacts as soon as possible. Further, we feel that coordination should continue following the relocation of the FBI Headquarters. For example, we feel that Transportation Demand Management services and strategies should be a significant part of this process, such as providing information on transit options, assigning parking to carpool users, and other options.
- On page 527, the DEIS notes that transportation mitigation measures that would be associated with the Springfield Alternative would “disturb and develop within the Resource Management Area.” Within Fairfax County’s Chesapeake Bay Preservation Ordinance, the county has adopted a jurisdiction-wide Resource Management Area designation. As such, any land disturbing activity outside of Resource Protection Areas would impact Resource Management Areas. It is not clear why the transportation mitigation efforts have been singled out in this regard.

### **Visual Resources**

- On page 531, the DEIS indicates that the Springfield Alternative would have a direct, long-term adverse visual impact. We strongly disagree with this conclusion. The DEIS states that “an adverse impact occurs when the building(s) would have a resultant effect on public views that appear out of place, discordant, or distracting when compared with the inherent, established character of the landscape.” While the county’s Comprehensive Plan recognizes the existing use on the site, it also provides options for higher intensity mixed use development. Further, the site is located within the Franconia-Springfield Transit Station Area (TSA), within which opportunities to develop higher intensity mixed use projects are identified. A project with nearly 1,000,000 square feet of office space has been approved for

an area immediately adjacent to the Springfield site (with office buildings of up to 150 feet in height), and the Plan for the TSA and broader Franconia-Springfield Area envisions a vibrant, mixed-use center destination that takes advantage of the diversity of transit options offered by the Joe Alexander/Franconia-Springfield Transportation Center (located less than ½ mile from the Springfield site). The visual character of the FBI headquarters building would be compatible with the character of the landscape that is envisioned, and that will be established, within this area. With respect to the impact of building shadows to the residences to the northeast of the Springfield site (identified on pages 532 and 533 of the DEIS), we acknowledge that there would be such impacts but note that the proposed building height (180 feet) would not be out of character with development that has already been approved in the immediate area or that could be anticipated on this site in the future. We therefore feel that this project would have a long-term, direct, beneficial impact to visual resources.

- On page 532, the DEIS recognizes that “these changes in the visual character of the Springfield site are envisioned for the site by Fairfax County as outlined in the Fairfax County Comprehensive Plan . . .” and that “the aesthetic quality of the site itself would be improved under the Springfield Alternative by the addition of trees and landscaped elements within a master planned site.” Similar conclusions have been identified for the Landover Alternative. Yet the report concludes that there would be a long-term adverse impact to visual resources for the Springfield Alternative. This is in contrast to the Landover Alternative, for which long term impacts to visual resources are considered to be both adverse and beneficial. There is a need for consistency in these conclusions.
- While the proposed location of the Central Utility Plant, Truck Screening and Remote Delivery Facility and standby generators would have the potential to create adverse visual impacts given their proximity to Loisdale Road, we are confident that siting, building design and site design measures could be pursued to minimize the potential for such impacts, and our staff is available to assist the FBI with the identification of such opportunities. We again question the conclusion that the Springfield Alternative would have an adverse impact on visual resources.
- As the higher intensity mixed use character of this area develops, the existing uses on the Springfield site would increasingly become “discordant or distracting when compared with the inherent, established character of the landscape.” As such, we disagree with the conclusion in the DEIS that the No-action Alternative would have no measurable impacts to visual resources. We consider the No-action Alternative to have an adverse visual impact and the Springfield Alternative to offer a beneficial visual impact.

### **Land Use**

- On page 530, the DEIS states that the No-action Alternative would have “no measurable impacts to land use and zoning because the continued operation of the site as a GSA warehouse complex would not alter the current zoning, the existing or planned uses, nor the

vision for the site under the relevant land use studies.” While the county’s Comprehensive Plan recognizes the reality of the existing use on the site, it also provides options for higher intensity mixed use development. The continued warehouse use of this site is contrary to the county’s vision for the Franconia-Springfield Area as articulated in the Comprehensive Plan—*“The vision for redevelopment in the Franconia-Springfield Area is to transform the area into a mixed use, easily accessible, and inter-connected place. Residents, employees, and visitors will have their essential needs and services proximate to one another and easily accessible by multiple means of transportation, particularly by walking and biking. Redevelopment also will serve the needs of the surrounding neighborhoods and, to a certain extent, the region. The vision has been developed to foster revitalization and reinvestment of the area . . .”* Within this context, we view the No-action Alternative as having an adverse land use impact.

- We consider the identification of the Springfield Town Center project on page 606 to provide an inaccurate and insufficient overview of the tremendous resources that this project currently offers and would increasingly offer to FBI employees. Aside from the mall renovation (1.3 million square feet of commercial space that opened in October 2014 and that already includes a far greater variety of eating establishments than what is suggested by the incorrect list of three fast food establishments), the narrative highlights only a hotel and a facility for the Metro Transit Police Department. The approved plans for the 78 acre site entails a multi-phased project that will expand the existing mall and transform the surrounding parking into a 5.7 million square foot mixed use town center, including up to 2,737 multifamily residential units, more than 1,952,000 square feet of retail space (including a grocery store), 1,044,000 square feet of office use and 450 hotel rooms. A network of urban parks facilitating both active and passive recreation will be integrated into all phases of the development. The vision for the Springfield Town Center is a walkable community where people can live, work, shop and enjoy entertainment and community activities. This is occurring within a walkable distance of the Springfield Alternative project site, and pedestrian, bicycle and vehicular movement improvements that were pursued as part of the first phase of the Town Center project will benefit the project’s connectivity to the FBI site.
- Figure 7-8 on page 478 incorrectly identifies a number of land uses in the area of the Springfield site. Retail (not residential) uses are located within the western portion of the area between Spring Mall Drive and the Franconia-Springfield Parkway and to the east of Frontier Drive. Retail (not office) uses are also located to the west of Loisdale Road north of Spring Mall Drive. As noted within the report narrative, land uses in the immediate area of the site are not all retail and industrial, as suggested by the map.
- With respect to Figure 7-9 on page 479, parcels to the southeast of the site are zoned C-4 and PDC. Zoning information is available from the county’s Digital Map Viewer site at <http://www.fairfaxcounty.gov/gis/DMV/Default.aspx> (see map tile 90-2).
- On page 479, the DEIS states that “the current comprehensive plan for the Franconia-Springfield area was adopted in 2013.” The plan was adopted in 2010.



- The discussion of the Springfield Connectivity Study on page 483 incorrectly identifies the location of the old Circuit City site on which the study recommended construction of a parking garage. The site is located on the south side of Old Keene Mill Road, to the west of Springfield Boulevard.
- The Patriot Ridge development is located incorrectly on Figure 8-3 (page 606)—it is located along Backlick Road a considerable distance south of where it is shown on this map.
- On page 606, the Embassy Suites development is identified as a past project contributing to cumulative conditions in the area, yet the project is not shown on Figure 8-3.

### **Surface Water, Hydrology and Stormwater Management**

- There is a tremendous opportunity at the Springfield site to improve stormwater management controls, which would support protection and restoration of downstream water resources, and the Springfield Alternative would provide these benefits. With the exception of small areas located along Loisdale Road near the entrance to the site and a narrow vegetated area along the northern site boundary, the Springfield property is entirely impervious. Further, little to no stormwater management has been provided on the site; currently, stormwater runoff is captured via inlets and directed off-site toward a tributary to Long Branch, and then into a wet pond. The DEIS indicates that the Springfield Alternative would convert this largely impervious site into a development with a pervious coverage of 45.4 percent. In addition, the project would be developed in accordance with Section 438 of the Energy Independence and Security Act of 2007, meaning that stormwater management efforts would go beyond levels of control that would be required by the county's Stormwater Management Ordinance. Considerable emphasis would be placed on stormwater reuse, infiltration and/or evaporation. Such efforts would provide considerable benefits to downstream water resources and would be supportive of the county's watershed management planning efforts, and we would welcome the opportunity for the improvements to water resources that this project would afford.
- The county's Stormwater Planning Division (SWPD) is available, upon request, to assist the FBI with the development of stormwater management strategies. SWPD is currently working to create a stormwater opportunity toolbox to implement management techniques for various land uses, and SWPD has developed case studies to identify approaches to retrofitting low impact development stormwater management practices into already-developed landscapes. One such case study was pursued on an intensively developed parcel immediately adjacent to the Springfield site--we can provide a document highlighting this effort if there is interest. Our staff is quite familiar with the stormwater management needs of this area and would welcome the opportunity to contribute its expertise during the FBI's development of detailed plans for the site.
- The DEIS indicates that there would be a long-term beneficial surface water impact associated with the Greenbelt Alternative. No similar benefit is identified for the Springfield

Alternative. The cause of the benefit for the Greenbelt Alternative would be the reduction in impervious cover that would be needed to ensure compliance with security setback distance requirements (perhaps along with strengthened stormwater management controls). The DEIS indicates that there would be an increase in pervious surface on that site of 1.6 acres, or 2.6 percent of the total site acreage. According to the “Hydrology” section of the report, for the Springfield Alternative, there would be an increase in pervious area of 26.1 acres, or 45.4 percent of the total site acreage. There would also be similar benefits among the build alternatives that would be associated with strengthened stormwater management controls. We agree with the conclusion that there would be a long-term surface water benefit associated with the Greenbelt Alternative, but we feel that a similar, if not greater, long-term beneficial impact to surface water should be identified for the Springfield Alternative.

- On page 607, the DEIS states: “There would be no measurable impacts to water resources under the Springfield Alternative, therefore there would be no measurable cumulative impacts.” As noted above, there are substantial beneficial impacts to water resources that would result from the Springfield Alternative, and other redevelopment projects in the area also provide opportunities for substantial improvements, both through reductions in impervious cover and improvements in stormwater management for the impervious cover that will remain after redevelopment. We disagree with the statement in the DEIS.

#### **Aquatic Species**

- On page 289, the DEIS indicates that there would be a long-term beneficial impact of the Greenbelt Alternative to aquatic species. No similar benefit is identified for the Springfield Alternative. The cause of the benefit for the Greenbelt Alternative would be stormwater management improvements. As noted above, there would be similar (if not greater) stormwater management benefits for the Springfield Alternative, and, in contrast to the Greenbelt Alternative, the Springfield Alternative would have no adverse impacts to wetlands or floodplains (recognizing that such impacts can adversely affect nearby water resources). While we agree with the conclusion that there would be a long-term benefit to aquatic resources associated with the Greenbelt Alternative, we feel that a similar, if not greater, long-term beneficial impact to aquatic resources should be identified for the Springfield Alternative.

#### **Geologic Resources, Topography and Soils**

- The DEIS describes an adverse impact to geologic resources, topography and soils as including “changes to the local topography that would occur beyond that which would result from natural erosion and deposition” and “changes from construction activities,” with an adverse impact involving such disturbances that would result in “short-term changes to the soil character or local geologic characteristics.” The DEIS indicates that the Springfield Alternative would create no long-term adverse impacts to topography but would have short term adverse impacts due to land disturbance that would be associated with development. It also concludes that there would be a long-term adverse impact to geology, although the

impact would be minimal given the extent of disturbance that has already occurred at the site. The DEIS does not, though, reach similar conclusions for the Greenbelt site, because the mixed-use development that would occur at that site under the No-action Alternative would create a similar impact. We disagree with this conclusion—construction at the Greenbelt site would have a similar impact to construction at the Springfield site, regardless of what might happen as an alternative at either site.

- The DEIS states that the Springfield site is situated within the Piedmont physiographic province. Based on soil types in the immediate area, it is our understanding that the site is located within the Coastal Plain. Figure 7-4 appears to have identified the Piedmont-Coastal Plain boundary farther east than is the case.

### **Vegetation**

- On page 529, the DEIS notes that there would be a long-term beneficial impact to vegetation for the Springfield Alternative due to the planting of trees, shrubs and grasses in areas that have been disturbed and are currently impervious. We encourage the FBI to emphasize the use of native plant species in its landscaping efforts.

### **Sustainable Design**

- The DEIS states that the project would be required to achieve a LEED® (Leadership in Energy and Environmental Design) Gold rating. We commend the FBI and GSA for this level of commitment to sustainable design.

### **Lighting**

- In addressing potential impacts of the Springfield Alternative to migratory birds, page 530 of the DEIS notes that the use of full cut-off lighting would minimize the potential for such impacts. The use of full cut-off lighting has many other benefits as well, and we commend the FBI for committing to the use of such lighting fixtures. We recommend that full cut-off lighting strategies be pursued for all lighting on the site, including security lighting.
- The conceptual site plan for the Springfield Alternative (presented on page 471) indicates that two employee parking garages would be located in proximity to the Springfield Crossing multifamily residential community and an adjacent hotel. If improperly designed, lights within the garage could create adverse glare impacts to the adjacent sites. There is also a potential for adverse impacts from headlight glare. We are confident that design efforts can be pursued for the garages that would ensure that these impacts would be avoided, and we are available to assist the FBI upon request in reviewing plans for the garages and offering guidance on such design efforts.

### **Environmental Justice**

- On page 492, the DEIS states: “One census tract, 9801, located within 1 mile of the site, has more than 20 percent of its population living in poverty and is identified as a poverty area.” This census tract appears to coincide with the Fort Belvoir North Area, where there are no residents. It is unclear how the conclusion in the DEIS has been reached.

### **Cultural Resources**

- While we appreciate the cursory investigation stated on page 485 in regard to the residential development within the APE (Area of Potential Effect) we note that there has been no architectural survey within the APE. Such a survey would be needed to reach a more definitive conclusion regarding identification of historic resources and potential impacts to those resources, and we would encourage the pursuit of such a survey. County staff is available to assist with such a survey, and we would welcome the opportunity to coordinate further with GSA and the FBI on identifying potential mitigation efforts in the event that such a survey was to identify one or more historically-significant resources.

### **Infrastructure and Utilities**

- The DEIS identifies the advantages of the Springfield Alternative regarding existing infrastructure, but these advantages are not clearly evident from the summary of environmental impacts as presented in the Executive Summary. As noted in the October 23, 2014 scoping letter from the Fairfax County Executive to GSA, there is an existing secure fiber optics system at the Springfield site that can serve the FBI’s communications needs--it has been reported to us that secure fiber lines cost multiple millions of dollars per mile. The DEIS notes that there would be short term adverse impacts for the Greenbelt and Landover alternatives associated with the connections to off-site secure fiber networks (3/4 mile in the case of Greenbelt and 1.5 miles in the case of Landover). With respect to electric power, the construction of on-site electrical substations would be needed at both the Landover and Greenbelt sites. Such a facility would not be needed at the Springfield site.

### **Public Safety**

- The DEIS concludes that, for the Greenbelt and Landover Alternatives, there would be beneficial long term impacts to public health and safety, because transportation mitigation measures that would be pursued would improve the flow of traffic and reduce response times for emergency vehicles. While similar benefits are noted for the transportation mitigation measures that would be pursued for the Springfield Alternative, the DEIS concludes that long term impacts to public health and safety would not be measurable. There should be a consistent finding among all three build alternatives.

### **Noise**

- We recognize that the preparation of NEPA documentation can present many moving targets, and the discussion of noise is one such issue. On November 17, 2015, the county's Board of Supervisors adopted revisions to the Noise Ordinance that will become effective on February 17, 2016. While the ordinance provisions as noted on page 523 of the DEIS did not establish different daytime vs. nighttime maximum noise levels, there will now be such a differentiation. See <http://www.fairfaxcounty.gov/dpz/zoning/noiseordinance/> for more information.
- The DEIS indicates that the Springfield and Landover Alternatives would create short term adverse noise impacts relating to construction. No short term impact is identified for the Greenbelt Alternative because the construction-related noise impacts would be similar to the construction-related impacts associated with a mixed-use development that would occur there for the No-action Alternative. We disagree with this conclusion—construction at the Greenbelt site would have a similar impact to construction at the Springfield (or Landover) site, regardless of what might happen as an alternative at either site.

### **Taxes**

- On page 536, the DEIS states that “any incomes earned by individuals who relocate to Fairfax County as a result of this project would generate income taxes for Fairfax County.” While the county would benefit from increased sales taxes generated by money spent in the county by FBI employees (whether or not they choose to move to the county) and visitors, and while the county would benefit from increased property tax revenue that may be associated with increased population/property ownership and/or property value increases that may result from the FBI consolidation and relocation, the county does not collect income taxes, so any income tax benefit would accrue to the Commonwealth of Virginia and not the county.

### **Other**

- There are several places in the DEIS where the document refers to the “city” of Springfield. This is most notable in the land use discussion beginning on page 479 but is also evident elsewhere (e.g., the Noise section on page 523). Springfield is not a city--it is an unincorporated area of Fairfax County.